

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

**METRO WEST AMBULANCE
SERVICE, INC.,**

Petitioner,

v.

**NATIONAL LABOR RELATIONS
BOARD,**

Respondent.

No. CA 14-1106

**STIPULATED MOTION
FOR ABEYANCE**

MOTION

Petitioner Metro West Ambulance Service, Inc. (“Metro West”) hereby requests that this Court place all actions and proceedings in this matter into abeyance. Counsel for Metro West has conferred with counsel for Respondent National Labor Relations Board (“NLRB”) regarding the subject matter of this Motion and the NLRB is in agreement that this case, including Petitioner’s Appeal and Respondent’s Cross-Application for

Enforcement, should be placed in abeyance pending satisfaction of the terms of the settlement agreement. (Declaration of Mitchell Cogen at ¶ 2). Following satisfaction of those settlement terms, the parties will file a joint stipulation for voluntary dismissal of this case in its entirety. *Id.*

This Motion is supported by the Declaration of Mitchell Cogen and is not filed for purposes of delay.

RESPECTFULLY SUBMITTED: September 10, 2015.

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By s/ Mitchell J. Cogen

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CERTIFICATE OF SERVICE AND FILING

I hereby certify that on September 10, 2015, I electronically filed with CM/ECF STIPULATED MOTION FOR ABEYANCE by Metro West Ambulance Service, Inc. I further certify that on the date set forth below I caused a copy of the above-mentioned document to be served, via CM/ECF to all counsel of record, if they are registered users or, if they are not, by serving a true and correct copy at the address listed below:

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DATED: September 10, 2015.

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